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February 28, 2006

The Honorable Charles Terreni
Chief Clerk and Administrator
South Carolina Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211

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2006 FEB 23 PM 3:46
SOUTH CAROLINA
PUBLIC SERVICE COMMISSION

Re: Application of IPC Network Services, Inc. for a Certificate of Public Convenience and Necessity to Provide Resold Local Exchange and Resold Long Distance Services within the State of South Carolina (SCPSC Docket No. 2006-55-C)

Dear Mr. Terreni:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,

Margaret M. Fox

Margaret M. Fox

Enclosures

cc: Thomas M. Lynch, Esquire
Florence P. Belser, Esquire

RETURN DATE: *OK D. Duke*
SERVICE: *OK D. Duke*

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2006-55-C

Re: Application of IPC Network Services, Inc.)
for a Certificate of Public Convenience and)
Necessity to Provide Resold Local Exchange)
and Resold Long Distance Services within the)
State of South Carolina)
_____)

**PETITION TO
INTERVENE**

In response to the Commission's Notice of the Filing of the Application of IPC Network Services, Inc. for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By: Margaret M. Fox

Attorneys for Intervenor South Carolina
Telephone Coalition

February 28, 2006

Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2006-55-C

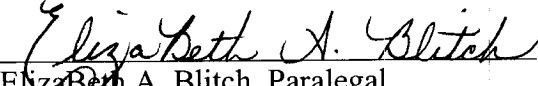
Re: Application of IPC Network Services, Inc.)
for a Certificate of Public Convenience and)
Necessity to Provide Resold Local Exchange)
and Resold Long Distance Services within the)
State of South Carolina)
_____)

**CERTIFICATE OF
SERVICE**

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

Thomas M. Lynch, Esquire
252 Providence Road, Suite 100
Annapolis, Maryland 21409

Florence P. Belser, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211.


ElizaBeth A. Blitch, Paralegal
McNAIR LAW FIRM, P.A.
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(803) 799-9800

February 28, 2006

Columbia, South Carolina